1	JUDITH BROWN CHOMSKY	•
2	LAW OFFICES OF JUDITH BROWN CHOMSKY Post Office Box 29726 Elkins Park, PA 19027	RECEIVED
3	Telephone: (215) 782-8367 Facsimile: (215) 782-8368 (Counsel of Record)	JUL 1 9 2007
5	RICHARD HERZ, ESQ.	M
6	MARCO SIMONŚ, ESQ. [S.B. #237314] EARTHRIGHTS INTERNATIONAL	WILLIAM T. WALSH CLERK
7	1612 K Street N.W., Suite 401 Washington, DC 20006	OEE,
8	Telephone: (202) 466-5188 Facsimile: (202) 466-5189	
9	[Counsel For Plaintiffs Continued On Next Page]	
10		
11	UNITED STATES DISTRICT COURT	
12	DISTRICT OF NEW JERSEY	
13		
14	JOHN DOE 1, individually and as representative of	Case No: 07-34-06 ( AGW
15	his deceased father JOHN DOE 2; JANE DOE 1, individually and as representative of	PLAINTIFFS' EX PARTE
16	her deceased mother JANÉ DOE 2;  JOHN DOE 3, individually and as representative of	APPLICATION FOR LEAVE TO FILE COMPLAINT AS PSEUDONYMOUS
17	his deceased brother JOHN DOE 4;  JANE DOE 3, individually and as representative of	PLAINTIFFS
18	her deceased husband JOHN DOE 5; MINOR DOES 1-4, by and through their guardian	
19	JOHN DOE 6, individually and as representative of their deceased mother JANE DOE 4;	
20	JOHN DOE 7, individually and as representative of	
21	his deceased son JOHN DOE 8,	
İ	Plaintiffs, v.	
22	CHIQUITA BRANDS INTERNATIONAL, INC., a	
23	New Jersey corporation; MOE CORPORATIONS 1–10;	
24	MOES 11-25,	
25	Defendants.	
26	()	
27		
28		

PLAINTIFFS' EX PARTE APPLICATION FOR LEAVE TO FILE COMPLAINT AS PSEUDONYMOUS PLAINTIFFS

Counsel for Plaintiffs (continued from first page) **PAUL HOFFMAN** SCHONBRUN, DESIMONE, SEPLOW, HARRIS & HOFFMAN LLP 723 Ocean Front Walk Venice, California 90210 Telephone: (310) 396-0731 Facsimile: (310) 399-7040 ARTURO CARRILLO COLOMBIAN INSTITUTE OF INTERNATIONAL LAW 5425 Connecticut Ave NW #219 Washington, DC 20015 Telephone: (202) 365-7260 

PLAINTIFFS' EX PARTE APPLICATION FOR LEAVE TO FILE COMPLAINT AS PSEUDONYMOUS PLAINTIFFS

Plaintiffs, by and through their counsel, hereby apply ex parte for leave to file their complaint using pseudonyms. Because of the nature of the allegations in plaintiffs' complaint, plaintiffs justifiably fear acts of reprisal that could inflict severe physical and mental harm on them and their families. In support of this motion, plaintiffs rely on the accompanying memorandum and the Declaration of Adam Isacson and Exhibits, filed herewith.

For these reasons and such other reasons as may appear just to the Court, Plaintiffs requests that their motion for leave to file the Complaint under pseudonyms be granted.

Dated: July 18, 2007

Respectfully submitted,

ly: Judith Brown Chomsky Attorney for Plaintiffs